

Bradley T. Hunsicker (Wyo. Bar 7-4579)
Jennifer Salisbury (Wyo. Bar. 7-5218)
MARKUS WILLIAMS YOUNG & ZIMMERMANN LLC
106 East Lincolnway Suite 300
Cheyenne, WY 82001
Telephone: 307-778-8178
bhunsicker@markuswilliams.com
jsalisbury@markuswilliams.com

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF WYOMING**

In re:)	
)	Case No.: 16-20326
POWELL VALLEY HEALTH CARE,)	Chapter 11
INC.,)	
Debtor.)	

**UNOPPOSED JOINT MOTION TO EXTEND TIME FOR HEALTHTECH
MANAGEMENT SERVICES, INC. AND WILLIAM PATTEN TO OBJECT TO
DISCLOSURE STATEMENT**

Undersigned counsel for Powell Valley Health Care, Inc. (the “Debtor”), Healthtech Management Services, Inc. (“Healthtech”) and Williams Patten (“Patten”) hereby file this Motion to Extend Time for Healthtech and Patten to file an objection to the Debtor’s Disclosure Statement (the “Motion”), and in support thereof would show the Court as follows:

1. On May 16, 2016 (the “Petition Date”), the Debtor commenced this case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Wyoming (the “Bankruptcy Court”).

2. The Debtor has continued in the possession of its property and has continued to operate and manage its business as a debtor-in-possession pursuant to Bankruptcy Code §§ 1107 and 1108.

3. On April 24, 2017, the Debtor filed its Disclosure Statement in Support of Chapter 11 Plan of Reorganization dated April 24, 2017 (the “Disclosure Statement”) (Doc. # 498).

4. On May 12, 2017, this Court ordered that any objections to the proposed Disclosure Statement be filed with the Court on or before June 22, 2017. The Court also set an evidentiary hearing on the Disclosure Statement for July 6, 2017.

5. The Debtor, Healthtech and Patten are in the midst of negotiations regarding the treatment of claims between Healthtech, Patten and the Debtor in the Debtor’s proposed Disclosure Statement and plan of reorganization. Healthtech, Patten and the Debtor agree that an extension of the deadline for Healthtech and Patten to object to the Disclosure Statement would be beneficial to the negotiations between these parties.

6. Thus, the Debtor, Healthtech and Patten request that the deadline for Healthtech and Patten to file an objection to the Disclosure Statement be extended to on or before June 29, 2017. No party in interest will be prejudiced by this extension considering, in part, that the scheduled hearing on the Disclosure Statement is not until July 6, 2017.

7. The Debtor has conferred with counsel for the Official Committee of Unsecured Creditors (the “Committee”) with respect to this extension and the

Committee's counsel has indicated that the Committee has no objection with the relief requested in this Motion.

WHEREFORE, for the reasons set forth herein, the Debtor, Healthtech and Patten respectfully request that the Bankruptcy Court extend the deadline for Healthtech and Patten to file an objection to the Debtor's proposed Disclosure Statement to on or before June 29, 2017.

Dated: Cheyenne, Wyoming
June 14, 2017

MARKUS WILLIAMS YOUNG AND
ZIMMERMANN LLC

By: /s/
Bradley T. Hunsicker (WY Bar No 7-4579)
Jennifer Salisbury (WY Bar No. 7-5218)
106 East Lincolnway Suite 300
Cheyenne, WY 82001
Telephone: 307-778-8178
Facsimile: 307-638-1975
Email: bhunsicker@markuswilliams.com;
jsalisbury@markuswilliams.com

Counsel for the Debtor-in-Possession

LINDQUIST & VENNUM, LLP

By: 
John C. Smiley, #5-2381
600 17th Street, Suite 1800 South
Denver, CO 80202-5441
Telephone: (303) 573-5900
Facsimile: (303) 573-1956
Email: ebirnberg@lindquist.com
jsmiley@lindquist.com

*Counsel for HealthTech Management Services, Inc.
and William D. Patten*